

NPDES_CAF0 Comments for dairies

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Subject: Comments for draft NPDES for dairies

Attached as a Microsoft Word document are comments for consideration.

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Enclosed are several comments for the draft National Pollution Discharge Elimination System (NPDES) general permit for existing concentrated Animal Feeding Operations (CAFCOs)

Attachment E for Manure Tracking Manifest asks for manure hauler information.

There are contractors who remove slurry from lagoons hydraulically by pumping the slurry out of the lagoon through the producer's existing pipeline or through a secondary pipeline set up specifically for the project. The form as presented does not address this application as an option.

Paragraph five on page 8 states: "The primary waste constituents of concern due to discharges of waste from dairies are ammonia, nitrates, phosphorus....." As an agronomist, these three terms are defined as plant nutrients, when applied to agricultural land. Perhaps the definition of "waste" can be re-evaluated.

There should be consideration of two different categories of neighboring farms where manure is discharged:

- Neighboring farmers who agree to receive the manure onto their own farming operation.
- Neighboring farmers who rent the farmland to dairy producers. In this case, the property owner is not involved in the management and decision making of when and how much manure is applied to the land on the property. In this case, the property owner who rents the farmland to a dairy operator should explicitly be exempt from reporting requirements and protected from penalties for potential miss-management of nutrient loading levels on the rented property by the operator.